UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

JANE DOE, et al * NO. 6:21-cv-00430-DCJ-CBW

vs. * JUDGE DAVID C. JOSEPH

EDOUARD d'ESPALUNGUE * MAGISTRATE JUDGE CAROL d'ARROS * B. WHITEHURST

REQUEST FOR ENTRY OF DEFAULT

Plaintiffs hereby request the Clerk of Court to enter a default against the defendant, Edouard d'Espalungue d'Arros, on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure. This Request is supported by an Affidavit in Support of Request for Entry of Default. After entry of default by the Clerk, plaintiffs will file a Motion for Evidentiary Hearing and Entry of Default Judgment.

Respectfully submitted,

DOMENGEAUX, WRIGHT, ROY & EDWARDS, LLC.

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Plaintiffs' Request for Entry of Default and Affidavit were sent to Defendant this date by placing a copy of same in the U. S Mail postage prepaid and properly addressed to the following two addresses:

Edouard d'Espalungue d'Arros c/o Philippe Arnaud d'Espalungue 65 Avenue Marceau 75116 Paris, Ile-de-France FRANCE

Edouard d'Espalungue d'Arros 10 Plage des Boulistes Canon 33950 Lège-Cap-Ferret FRANCE

I further certify that copies of the Request for Entry of Default and Affidavit were emailed on this the 6th day of July 2022 to two email addresses used in the past by Edouard d'Espalungue d'Arros (ed.eda@gmx.com and edouard.dsp@outlook.com) and to Pierre Hourcade, an attorney who represented Mr. d'Espalungue in 2020-2021 in connection with Mr. d'Espalungue's claimed inability to return to the United States to face criminal charges, at contact@frenchattorney.com.

/s/ Elwood C. Stevens, Jr.